

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION

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CHIQUITA SCHADWICK, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,  
v.

Case No. 2:22-CV-1120

**COLLECTIVE ACTION COMPLAINT  
PURSUANT TO 29 U.S.C. § 216(b)**

NSH PORT WASHINGTON, LLC,  
  
Defendant.

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**UNOPPOSED MOTION FOR EXTENSION OF DEADLINE TO  
FILE JOINT MOTION FOR APPROVAL OF OPT-IN SETTLEMENT**

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Defendant, NSH Port Washington, LLC (“NSH Port Washington”), moves this Court for an extension of the deadline to file a joint motion for approval of opt-in settlement. NSH Port Washington and Plaintiff, Chiquita Shadwick (“Ms. Shadwick”), individually and on behalf of all others similarly situated (collectively the “Parties”) have discussed this motion, and Ms. Shadwick does not oppose it. In support of this joint motion, NSH Port Washington states as follows:

1. On the morning of June 1, 2023, the Parties participated in a telephonic status hearing before this Court.
2. During the status hearing, the Parties commented on the status of the case and informed the Court that the Parties had reached an agreement on a method of calculating damages for the proposed collective.
3. Based on this information, the Court ordered NSH Port Washington, by June 8, 2023, to transfer to Ms. Shadwick its damages calculations. Ms. Shadwick was ordered to thereafter make a settlement demand, and the Parties were to file a joint motion for approval of

opt-in settlement by June 23, 2023.

4. Since the June 1, 2023 status hearing, NSH Port Washington has encountered significant difficulty obtaining access to time and pay records from several years ago that are being held by its prior payroll company. These historic records are necessary for finalization of NSH Port Washington's damages calculations.

5. Accordingly, NSH Port Washington now seeks an extension of the deadline to file a joint motion for approval of opt-in settlement. Specifically, NSH Port Washington respectfully requests that the Court extend that deadline by 30 days, to July 24, 2023.

6. This motion is filed before the deadline to file a joint motion for approval of opt-in settlement, in good faith and not for the purpose of unwarranted delay.

WHEREFORE, NSH Port Washington respectfully requests that the Court extend its deadline to file a joint motion for approval of opt-in settlement by 30 days, to July 24, 2023.

Dated this 22nd day of June, 2023.

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